

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: Marie Lee,

Debtor.

Case No.: 19-30739-beh-13

MOTION OF THE DEBTOR TO CONTINUE THE AUTOMATIC STAY

PLEASE TAKE NOTICE that the debtor by her attorney, J. Kenyatta Riley, hereby moves the court for a continuation of the automatic stay pursuant to Section 362 of the Bankruptcy Code and in support of said motion, alleges as follows:

1. The debtor has been a debtor in one Chapter 13 Bankruptcy within the proceeding one year period of the above-referenced case.
2. There has been a substantial change for the debtor, since the last filing.
3. That at the time of the filing of the previous case, the debtor had not paid the court filing fee and said case was dismissed due to said non-payment.
4. The debtor has now paid the court filing fee.
5. The debtor will be now receiving financial contribution from one or more family members to assist with monthly expenses and/or trustee's payments.

WHEREFORE, the debtor respectfully requests that the court continue the automatic stay.

Dated at Milwaukee, Wisconsin this 18th day of November, 2019.

EISENBERG & RILEY, S.C.
Attorney for Debtor

By: S/
J. Kenyatta Riley
State Bar No.: 01026897

P.O. ADDRESS:
2228 W. Wells St.
Milwaukee, Wisconsin 53233
Phone: (414) 933-0000

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT COURT OF WISCONSIN**

In re: Marie Lee,

 Debtor.

**AFFIDAVIT OF THE DEBTOR IN SUPPORT
OF MOTION TO CONTINUE THE AUTOMATIC STAY**

STATE OF WISCONSIN)
 (SS
MILWAUKEE COUNTY)

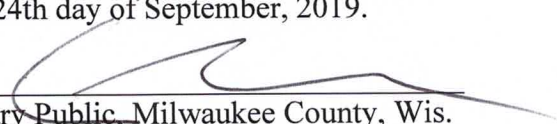
That your affiant declares and swears under oath the follow:

1. That the affiant is the debtor in the above-referenced matter.
2. That the affiant has been in a previous Chapter 13 Bankruptcy within the proceeding on year period of the above-referenced case.
3. That there has been substantial change for the affiant, since the last filing.
4. That the previous case was dismissed due to the failure to pay the court filing fee in a timely fashion.
5. That in this current case, the affiant will pay the filing fee upon filing.
6. That the affiant will have family members contributing to her household and/or contributing to trustee's payment.
7. That this Affidavit is made in support of the Motion to Continue Stay.

Dated in Milwaukee, Wisconsin, this 24th day of September, 2019.


Marie Lee

Subscribed and sworn to before me
this 24th day of September, 2019.


Notary Public, Milwaukee County, Wis.
My Commission is permanent.

Document Prepared By:
Eisenberg & Riley, S.C.
2228 W. Wells St.
Milwaukee, WI 53233
(414) 933-0000

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: Marie Lee,

Debtor.

Case No.: 19-30739-beh-13
Objection to Motion to
Continue Stay Due 12/09/2019

Hearing on Time Filed
Objections 12/10/2019 @ 10:30 am

**NOTICE OF HEARING ON DEBTOR'S MOTION TO
CONTINUE THE AUTOMATIC STAY**

To all creditors and parties in interest:

The debtor in the above-captioned case has filed a motion to continue the automatic stay pursuant to 11 USC Sec. 362(c)(3)(B). A copy of that motion accompanies this notice.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the motion, or if you want the Court to consider your views on the motion, **then on or before the objection due date sated above, you or your attorney must an objection with:**

Clerk of Bankruptcy Court, US Federal Courthouse
Eastern District of Wisconsin
517 E. Wisconsin Ave.
Milwaukee, WI 53202
and provide copies to:

J. Kenyatta Riley, Esq.
2228 W. Wells St.
Milwaukee, WI 53233

Chapter 13 Trustee
PO Box 5109290
Milwaukee, WI 53203

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

The Court will hold a hearing on any timely-filed objection. That hearing will take place before the Honorable Beth E. Hanan, United Sates Bankruptcy Judge, in the United States Courthouse at 517 E. Wisconsin Ave., Milwaukee, WI in Room 150, on December 10, 2019 at 10:30 am. The debtor and the objecting party and/or their counsel must attend the hearing.

The Court also will hold a hearing if the debtor fails to file a supporting affidavit or declaration that complies with 11 USC Sec. 362(c)(3)(B). The hearing will take place at the same time and place stated above and the debtor and the debtor's counsel must attend this hearing or the Court will not grant the motion. If the debtor files such an affidavit, but the Court determines that it is insufficient to comply with Sec. 362(c)(3)(B), the Court will notify counsel for the debtor.

Dated: November 18, 2019

EISENBERG, RILEY & ZIMMERMAN, S.C.
Attorneys for the Debtor

By: s/
J. Kenyatta Riley
State Bar No.: 1026897

P. O. ADDRESS:
2228 W. Wells St.
Milwaukee, WI 53233
Phone: (414) 933-0000
Fax: (414) 933-0001

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

In re: Marie Lee,

Debtor.

Case No.: 19-30739-beh-13

CERTIFICATE SERVICE BY MAIL

I hereby certify that copies of Debtor's Notice of Motion and Motion to Continue the Automatic Stay was served upon the parties listed below by enclosing said documents in an adequately postage-paid envelope which bore the sender's name and return address and which was addressed to each such person at their respective addresses and which was duly deposited with the US Postal Services and/or electronically served on or about November 18, 2019.

S/Marlene Black
Marlene Black

P.O. ADDRESS:
2228 W. Wells St.
Milwaukee, Wisconsin 53233
Phone: (414) 933-0000

Label Matrix for local noticing
757-2
Case 19-30739-beh
Eastern District of Wisconsin
Milwaukee
Tue Nov 19 17:31:26 CST 2019
Clerk, US Bankruptcy Court
17 E. Wisconsin Ave.
Milwaukee, WI 53202-4582

City of Milwaukee
Milwaukee Water Works
200 W. Wells St., #800
Milwaukee, WI 53203

(p)CITY OF MILWAUKEE TREASURER'S OFFICE
200 EAST WELLS STREET
ROOM 103
MILWAUKEE WI 53202-3599

Milwaukee Municipal Court
951 N. James Lovell St.
Milwaukee, WI 53233-1429

Nissan Motor Acceptance Corp
PO Box 660366
Dallas, TX 75266-0366

Office of the U. S. Trustee
17 East Wisconsin Ave.
Room 430
Milwaukee, WI 53202-4510

WE Energies
333 W. Everett St., #A130
Milwaukee, WI 53203-2803

Wisconsin Department of Revenue
Attn: Special Procedures, MS 4-SPU
PO Box 8901
Madison, WI 53708-8901

M. Kenyatta Riley
Rosenberg & Riley
228 W. Wells St.
Milwaukee, WI 53233-1919

Marie Lee
4042 N. 19th Place
Milwaukee, WI 53209-6807

Rebecca R. Garcia
Chapter 13 Trustee
PO Box 3170
Oshkosh, WI 54903-3170

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

City of Milwaukee Treasurer
100 E. Wells St., #103
Milwaukee, WI 53202

End of Label Matrix	
Mailable recipients	11
Bypassed recipients	0
Total	11